

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
PARKERSBURG**

**CONN FEAMSTER and
SANDRA FEAMSTER,**

Plaintiffs,

vs.

**Civil Action No. 6:10-cv-241
Chief Judge Goodwin**

**HIGHMARK WEST VIRGINIA INC.
d/b/a MOUNTAIN STATE BLUE CROSS
& BLUE SHIELD and RELATIONAL
MANAGEMENT SERVICES, LLC,**

Defendants.

STIPULATION TO EXTEND PROTECTIVE ORDER

WHEREAS, in the above-captioned civil action Plaintiffs Conn Feamster and Sandra Feamster and Defendants Highmark West Virginia Inc. d/b/a Mountain State Blue Cross Blue Shield (“MSBCB”) and Relational Management Services, LLC (“RMS”) entered into an agreed protective order which was entered by the Court on August 2, 2010 (Exhibit 1 attached) (“the Protective Order”);

WHEREAS, RMS has served a subpoena for documents on the Custodian of Records of Solacium Holdings, LLC (“Solacium”) (Exhibit 2 attached);

WHEREAS, it is anticipated that confidential and proprietary information may be included in the documents to be produced by Solacium in response to RMS’s subpoena; and

WHEREAS, the Plaintiffs, MSBCBS, and RMS desire to extend to Solacium the protections accorded to the parties under the Protective Order;

WHEREAS, counsel for Solacium, Shane L. Keppner of the firm of Bennett Tueller Johnson & Deere, and Lance R. Davis, Solacium’s Chief Financial Officer, have received copies

of and agreed to be bound by the terms of the Protective Order and acknowledged that they are subject to the jurisdiction of this Court for purposes of compliance therewith (Exhibit 3 attached).

NOW, THEREFORE, it is hereby **STIPULATED AND AGREED** that for purposes of responding to RMS's subpoena, and the deposition testimony of Solacium representative with respect thereto, Solacium shall be protected under the terms of the Protective Order and entitled to designate as "**CONFIDENTIAL**" documents or other materials as to which it has a good faith belief are confidential and should not be disclosed other than in connection with this action.

ENTER: January __, 2011

Parties and Counsel:

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